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Counsel for Defendant COFIELD

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAMON COFIELD,

Defendants.

Case No. CR 19-00100-VC

**DECLARATION OF JOSHUA  
MICHEL IN SUPPORT OF RAMON  
COFIELD'S MOTION TO SUPPRESS**

I, JOSHUA MICHEL, declare and state that:

1. I am a digital forensics expert and Senior Forensic Examiner employed by Roloff Digital Forensics, LLC, a firm specializing in digital forensics. I have been employed in the digital forensics field since 2013. I am competent to testify and the matters contained herein are based on my own personal knowledge. With respect to those matters not personally known to me, I make this declaration upon information and belief.
2. I have been retained as a digital forensics expert by counsel for defendant for the purpose of assisting with matters related to the searching, collecting, analyzing and producing of electronic evidence in this case.


3. I have over 13 years of experience working in various facets of Information Technology (IT) and Network Security. In addition, I have also owned and operated a photography company. My interest in this area led me to specialize in the analysis of multimedia as well as the advanced software processing and manipulation of such electronic file formats. I have achieved and maintain certifications related to my current field, digital forensics, I am an EnCase Certified Examiner (EnCE), and a Cellebrite Certified Mobile Examiner (CCME), Physical Examiner (CCPA), and Logical Operator (CCO). I have been recognized as a digital photography, digital forensic and computer forensic expert witness in United States Military Court and state courts throughout the country.
4. I am familiar with tumblr, the website that generated the NCMEC cybertip in this case. Tumblr is a microblogging website, meaning tumblr users may post short images, video, music, text, or other media to their own personal tumblr blog. They may follow other users' blogs and other users may follow their blogs.
5. As part of my review of evidence in this case, I reviewed the November 8, 2017, Cybertipline Report (Exhibit A, USRC000001- USRC000012) from tumblr, the tumblr search warrant (Exhibit B, USRC000228 - USRC000233), the Google search warrant (Exhibit C, USRC000173 - USRC000178), and the chaz2076.tumblr.com blog posts and user information produced by tumblr.
6. Tumblr requires an email address to register for a tumblr user account. Once tumblr has verified the email address, the account creation is complete, and the user will not need to access the email address again in order access the tumblr account, unless the user forgets their password.<sup>1</sup> A tumblr user does not need utilize their email to upload an image to their tumblr blog.
7. A Tumblr user may make any post to their blog private.<sup>2</sup> A private post is visible only to the author, unless it is posted to a group blog or the specific web address is shared.
8. One tumblr user cannot upload media or post to another individual user's blog.

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<sup>1</sup> <https://support.tumblr.com/post/21266832320/how-to-update-your-registered-email-address-why#:~:text=If%20it's%20a%20valid%20email,registering%20for%20Tumblr%2C%20correct%20it.>

<sup>2</sup> <https://tumblr.zendesk.com/hc/en-us/articles/231476507-Private-posts>

1 I declare under penalty of perjury that the foregoing is true and correct and that this declaration  
2 was executed on November 30, 2020, in Spokane, Washington.

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